

PC 3/28/2024
ITEM #2
2 PAGES

CCUP21-0004 Single Source

Mike Sullivan <mikesul@yahoo.com>

Tue 3/26/2024 9:32 PM

To: Planning Department <planning@edcgov.us>

CCUP21-0004 Single Source

Planning department,

In addition to the other concerns addressed:

HAWKS and OWLS loosing nesting and foraging areas:

During the initial construction phase, habitat destruction occurs as land is cleared for development. Raptors may lose their nesting sites, foraging areas, and shelter, leading to displacement or abandonment of their territories. Construction activities such as heavy machinery, excavation, and noise can disturb raptors and disrupt their breeding behaviors. Increased human presence may cause stress and avoidance behaviors in raptors, impacting their ability to successfully breed and rear young. Construction activities can destroy or fragment owl habitats. Raptors may have active nests in trees or structures within the construction site.

Without proper mitigation measures, these nests can be accidentally destroyed during construction, leading to loss of eggs, chicks, or even adult birds. Loss of nesting sites and foraging areas can negatively impact owl populations. Urban development can also lead to light pollution, which may disrupt owl nesting and hunting behaviors. Owls may be less successful at hunting in well-lit areas, affecting their ability to feed themselves and their chicks. With the possibility of future cannabis grow area development there would be continued habitat loss. Once the initial construction phase is complete, the development of a cannabis grow area may further contribute to habitat loss for raptors. Additional land clearing and infrastructure development may fragment habitats and decrease available nesting and foraging areas for raptors.

Chemical Exposure:

Pesticides, herbicides, and fertilizers commonly used in cannabis cultivation can pose risks to raptors and their prey. Raptors may be exposed to these chemicals directly through ingestion or indirectly through contaminated prey, leading to health issues and reduced reproductive success.

Increased Human Activity:

The establishment of a cannabis grow area may attract increased human activity, including workers, visitors, and potential trespassers. Raptors may perceive human presence as a threat and abandon nearby nesting sites, disrupting breeding behaviors and population dynamics.

Conclusion:

By considering the potential impacts of construction activity and cannabis cultivation on raptor nesting. It's essential to prioritize habitat protection and responsible land management to ensure the long-term survival of raptor populations in the area. A person who intentionally disturbs these raptors may possibly be in violation of Title 36 Code of Federal Regulations section 2.2 (a)(2) The feeding, touching, teasing FRIGHTENING or INTENTIONAL disturbing of wildlife nesting, breeding, or other activities. This cannabis grow not only poses potential harm to human populations but also the wildlife and protected raptors. I strongly urge the Planning Commission to consider NOT APPROVING the project.

Regards,

M. Sullivan

PC 3/28/2024
ITEM # 2
15 PAGES


CCUP21-0004/Single Source – 4941 D'Agostini Drive

Cammy &/or Michael Morreale <mcmorreale@sbcglobal.net>

Tue 3/26/2024 9:33 PM

To: Planning Department <planning@edcgov.us>

Cc: Evan R. Mattes <Evan.Mattes@edcgov.us>; Karen L. Garner <Karen.L.Garner@edcgov.us>

 5 attachments (8 MB)

Single Source Public Review Letter - Cammy Morreale.pdf; Public Comment Paul Schafer SCS Odor Expert - CCUP21-0004.pdf; Rick Blodgett Laboratory Director Water Environmental Testing - Email 3-25-24.docx; Dave Sederquist Engineering Geologist Hydrogeologist (Youngdahl) - Email 3-1-24.docx; Ground Water in Fractured Hard Rock - California Department of Water Resources.pdf;

Dear Clerk of the Planning Department:

Please upload the attached documents representing my Public Review Response for the subject project and Planning Commission meeting on March 28, 2024. Please be sure to forward this documentation to all Planning Commission Board Members and anyone else you deem appropriate.

Thank you for your assistance,

Cammy Morreale
818-681-8552

Cammy Morreale
6625 Perry Creek Road
Somerset, CA 95684
mcmorreale@sbcglobal.net

March 26, 2024

VIA E-MAIL

El Dorado County Planning Commission
% Evan Mattes, Senior Planner
2850 Fairlane Court
Placerville, CA 95667
planning@edcgov.us

RE: CCUP21-0004/Single Source – 4941 D'Agostini Drive

Dear Planning Commissioners:

I am a resident near Mr. Mike Pinette's proposed cannabis project and urge you to make the following decisions in the hearing on March 28, 2024:

- **Reject the Mitigated Negative Declaration "MND" and Initial Study** as there are flaws and gaps in the evidence and there is "Substantial Evidence & Fair Argument" there will be significant environmental impact. In this situation, the **"Fair Argument Standard" requires there must be an Environmental Impact Report "EIR".**
- **Reject the Mitigation Monitoring and Reporting Plan "MMRP"** as there are flaws and gaps in the evidence and there is "Substantial Evidence & Fair Argument" there will be significant environmental impact. In this situation, the **"Fair Argument Standard" requires there must be an Environmental Impact Report "EIR".**
- **Deny the Commercial Cannabis Use Permit** as there are flaws and gaps in the evidence and there is "Substantial Evidence & Fair Argument" there will be significant environmental impact. In this situation, the **"Fair Argument Standard" requires there must be an Environmental Impact Report "EIR".**

I offer you five (5) Expert Opinions representing there is "Substantial Evidence" for the "Fair Argument Standard" supporting our demand that the Project prepare an EIR. An EIR is required when there is substantial evidence of Significant Environmental Impact.

#1 - Water Quality – in the following Email from the subject matter expert Rick Blodgett ("Water Environmental Testing Laboratory" in Shingle Springs), Rick recommends a baseline Title 22 and Monitoring Wells to be used for continuous water quality

inspections/oversight/tracking. Additionally, Rick Blodgett is a PhD in Public Health Epidemiology with 40 years experience in Chemical and Microbiology.

From: Rick Blodgett <wet.laboratory@gmail.com>
To: mcmorreale@sbcglobal.net <mcmorreale@sbcglobal.net>
Sent: Monday, March 25, 2024 at 01:29:49 PM PDT
Subject: Inquiry for Water Quality Teasting

Cammy Morreale

March 25, 2024

Dear Ms. Morreale,

Thank you for your inquiry on what water quality parameters to test for in private wells that are adjacent to commercial farming facilities. In determining whether fertilizers, pesticides, herbicides, or industrial solvents may leach into the watershed or a well aquifer, it is suggested that a baseline Title 22 be conducted on the well in question to determine water quality constituents before the farming practices have begun.

Good farming and environmental monitoring practices also suggest that monitoring wells be used at the perimeter of the farming property to test for possible contaminant intrusion. If there are streams or waterways that may be impacted by the agricultural practices, then an NPDES permit may be required by regulatory agencies. I would suggest viewing the environmental impact report (EIR) from the farming facility to determine the pesticide/herbicide application permit. Presently in El Dorado County, the synthetic organic compounds (SOC) required to test are:

- Alachlor (EPA 525.2)
- Atrazine (EPA 525.2)
- Simazine (EPA 525.2)
- Lindane (EPA 508)
- Toxaphene (EPA 508)
- Carbofuran (EPA 531.1)
- 2,4-D (EPA 515.1)
- Diquat (EPA 549.2)
- Endothall (EPA 548.1)
- Glyphosate (EPA 547)

Additional tests required by the county for small water systems are volatile organic compounds (VOC), radiological (Gross alpha), natural uranium, and radium 226 & 228.

Title 22 will be more comprehensive, but this list is the minimum requirements for a water quality package in this county.

If you have further questions please feel free to call me at 530 677-5776.

Richard R. Blodgett, Ph.D.
Laboratory Director
Water Environmental Testing Laboratory
(530) 677-5776

#2 - Water Supply and Quality – in the following email from subject matter expert Dave Sederquist (Senior Engineering Geologist/Hydrogeologist with Youngdahl Consulting Group), Dave recommends monitoring wells to ensure water supply and water quality do not negatively impact neighboring wells.

From: Dave Sederquist <dc@youngdahl.net>
To: mcmorreale <mcmorreale@sbcglobal.net>
Sent: Friday, March 1, 2024 at 09:45:54 AM PST
Subject: RE: Commercial Cannabis Project at 6540 Perry Creek Road Somerset (David Harde, Owner)

Cammy, the best way to answer your question is that it is not unreasonable to be concerned about a neighboring project adversely impacting groundwater resources. Often a project will go through review and the impacts estimated. Mitigation measures might be required; often as a mitigated negative declaration. In El Dorado County, when developing a subdivision project relying on wells, there is a requirement that adequate groundwater resources be shown to be present. Where certain projects have a potential to impact groundwater quality, monitoring wells might be required.

Without knowing details, this about as specific as I can get. I hope this helps.

David C. Sederquist, C.E.G., C.H.G.
Senior Engineering Geologist/Hydrogeologist
YOUNGDAHL CONSULTING GROUP, INC.
1234 Glenhaven Ct, El Dorado Hills, CA 95762
Office: (916) 933.0633 Fax: (916) 933.6482

#3 – Water Table – more evidence and mitigation is needed to ensure neighboring wells do not run dry and/or get contaminated from herbicides, pesticides and fertilizers used for cannabis projects. I encourage you to read the attached study from the California Department of Water Resources called "Ground Water in Fractured Hard Rock". A quote in this study states: "Also, keep in mind that a neighboring well can interfere with your well. How much water passes through fractured rock varies greatly depending on connections between fractures. As a result, interference between neighboring wells is difficult or impossible to predict in advance. The best insurance against such problems is large lot sizes. Wells on lots as large as nine acres have gone dry." In addition per David Sederquist (Geologist/Hydrogeologist with Youngdahl

Consulting Group), "Where certain projects have a potential to impact groundwater quality, monitoring wells might be required."

#4 - Odor Mitigation "Fans" – in the 3/5/2024 Board of Supervisor "BOS" meeting for File #24-0275 the CCUP-A24-0001 David Harde Permit Appeal, Lori Parlin (Board of Supervisor District 4) attested to the fact that "FANS" do not work in El Dorado County and Evan Mattes attested to the fact that there is NO evidence that "FANS" will work. This is additional "Substantial Evidence" for the "Fair Argument Standard" supporting our demand that the Single Source Project prepare an EIR. This is required when there is substantial evidence of Significant Environmental Impact.

Please review the video recording for File #24-0275 in the BOS 3/5/2024 hearing starting at time counter 5:46:58 to evidence Lori Parlin's professional opinion regarding the failure of FANS in El Dorado County.

#5 – Odor Study – in Paul Schafer ("SCS Engineers & Environmental Consultants", a National Expert on Odor Management) Odor Report, he states the Project's Odor study is flawed and does not actually reflect the conditions present at the proposed grow site therefore the project's study severely underestimates the potential odor. The original study by the Project states that the odor at the western property line will exceed the allowable threshold. The study also does not address the odors that will be emitted during the processing and drying of the cannabis crop, which are said to be the most pungent. (See analysis of odor study by Paul Schafer of SCS Engineers and Environmental Consultants, submitted by counsel to the Committee to Protect River Pines Estates)

RECAP:

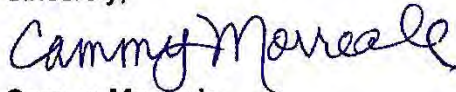
These five (5) Fact Based/Expert Opinions support the "Fair Argument Standard" and Substantial Evidence that there will be Significant Environmental Impact.

TAKE APPROPRIATE ACTION ON MARCH 28, 2024 BY DOING THE FOLLOWING:

- **Reject the Mitigated Negative Declaration "MND" and Initial Study** as there are flaws and gaps in the evidence and there is "Substantial Evidence & Fair Argument" there will be significant environmental impact. In this situation, the **"Fair Argument Standard" requires there must be an Environmental Impact Report "EIR"**.
- **Reject the Mitigation Monitoring and Reporting Plan "MMRP"** as there are flaws and gaps in the evidence and there is "Substantial Evidence & Fair Argument" there will be significant environmental impact. In this situation, the **"Fair Argument Standard" requires there must be an Environmental Impact Report "EIR"**.
- **Deny the Commercial Cannabis Use Permit** as there are flaws and gaps in the evidence and there is "Substantial Evidence & Fair Argument" there will be significant environmental impact. In this situation, the **"Fair Argument Standard" requires there must be an Environmental Impact Report "EIR"**.

Thank you for your consideration!

Sincerely,



Cammy Morreale

Resources attached and/or links provided:

Water Supply –

Email From: Rick Blodgett <wet.laboratory@gmail.com>

Sent: Monday, March 25, 2024 at 01:29:49 PM PDT

Subject: Inquiry for Water Quality Teasting

Water Supply & Quality -

Email From: Dave Sederquist <dcsc@youngdahl.net>

Sent: Friday, March 1, 2024 at 09:45:54 AM PST

Subject: RE: Commercial Cannabis Project at 6540 Perry Creek Road Somerset (David Harde, Owner)

Water Supply & Quality -

Ground Water in Fractured Hard Rock: https://water_fact_1__2011.pdf (ca.gov)

Odor Fans:

El Dorado County Board of Supervisor's Hearing Video recording for File #24-0275 in the BOS hearing from 3/5/2024 meeting starting at time counter 5:46:58

https://eldorado.granicus.com/player/clip/2024?view_id=2&redirect=true

Odor:

Paul Schafer ("SCS Engineers & Environmental Consultants", a National Expert on Odor Management) Odor Report

From: Rick Blodgett <wet.laboratory@gmail.com>
To: mcmorreale@sbcglobal.net <mcmorreale@sbcglobal.net>
Sent: Monday, March 25, 2024 at 01:29:49 PM PDT
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Cammy Morreale

March 25, 2024

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- 2,4-D (EPA 515.1)
- Diquat (EPA 549.2)
- Endothall (EPA 548.1)
- Glyphosate (EPA 547)

Additional tests required by the county for small water systems are volatile organic compounds (VOC), radiological (Gross alpha), natural uranium, and radium 226 & 228. Title 22 will be more comprehensive, but this list is the minimum requirements for a water quality package in this county.

If you have further questions please feel free to call me at 530 677-5776.

—
Richard R. Blodgett, Ph.D.
Laboratory Director
Water Environmental Testing Laboratory
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From: Dave Sederquist <dcs@youngdahl.net>
To: mcmorreale <mcmorreale@sbcglobal.net>
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Without knowing details, this about as specific as I can get. I hope this helps.

David C. Sederquist, C.E.G., C.H.G.

Senior Engineering Geologist/Hydrogeologist

YOUNGDAHL CONSULTING GROUP, INC.

1234 Glenhaven Ct, El Dorado Hills, CA 95762

Office: (916) 933.0633 Fax: (916) 933.6482

Electronic Documents (if attached): Youngdahl Consulting Group, Inc. provides all final documentation, proposals, and contracts in PDF format unless otherwise requested. Modification to the document, including but not limited to removal of security features, deletion of pages, copying or editing text, is not permitted or approved by our firm.

Dispatch Requests: All requests for dispatching regarding inspection services during earthwork or construction operations should be directed toward our dispatcher (Chris Cravens) at 916-933-0633 or dispatch@youngdahl.net.

March 25th, 2024
File No. 24224153.00

MEMORANDUM

TO: Mr. Todd R. Moore, Hahn & Hahn LLP

FROM: Paul Schafer, Vice President, SCS Engineers

SUBJECT: Review of "Updated Notice of Intent to Adopt A Mitigated Negative Declaration" in
Regards to Potential Odor Impacts from Project CCUP21-0004/Single
Source

1 INTRODUCTION

SCS has been retained by Hahn and Hahn LLP (Client) for support services related to the review of site plans, a dispersion model, odor control plans and the potential impacts of odor emissions from proposed cannabis facility operations in El Dorado County. The project in question is CCUP21-0004/Single Source and the project located on the north side of D-Agostini Drive, approximately 1 mile west of the intersection with Aukum Road, in the Somerset area.

The state of understanding relative to the main cause of odor and, more specifically, the objectionable "Skunky" odor from cannabis emissions and the methods to mediate them from cannabis cultivation is rapidly evolving. Just a few years ago, it was a common perception that the main culprit relative to odors from cannabis operations were terpenes with Myrcene being the main identified culprit. We now know that although Terpenes are a part of the odor profile, they are not the cause of the unpleasant "Skunky" odor character that can be experienced downwind of cannabis operations.

In addition, there are considerable issues and complications that arise when attempting to describe or estimate a facilities potential odor impacts. These include several factors:

- 1) Cannabis, like most plants, has the potential to emit hundreds of different chemicals. Each at various rates, at widely divergent odor detection thresholds, and dependent on several external variables;
- 2) Emission rates are not constant throughout the cannabis plants life cycle or within the plant's daily cycle;
- 3) Emission rates can be influenced by temperature, exposure to light radiation, degree of agitation, plant stresses, among other external factors.
- 4) The ratios of compounds emitted by cannabis are not constant through the plant's life cycle and the times of highest emissions of certain compounds can be decoupled from other types of compounds.

Finally, there are various technologies that have been used and are being vetted for use in regards to odor mitigation from cannabis operations. From enclosed spaces, the technology of choice has been, and continues to be, scrubbing the effluent point through the use of tried and true carbon scrubbers. However, for vented greenhouses that take advantage of the local climate for temperature and humidity controls, the best technology for use in this space is still up for debate. Vapor Phase odor



neutralizers have been used with some success but this technology has limitations and is not looked at favorably by the general public. Standalone carbon scrubbing systems with various pretreatment options have also been shown to be capable of significantly reducing the potential for odor emissions from greenhouse spaces. Each of these technologies, when utilized in open air cultivation/harvesting operations are even less effective as contact with the odorous plume is required.

The following sections review the components of the "Updated Notice of Intent to Adopt A Mitigated Negative Declaration" (MND) in Regards to Potential Odor Impacts and specifically the project – specific Odor Analysis included as Appendix E. This Odor Analysis was the basis of the County's assessment that "No odor Mitigation is required" since the analysis showed impacts less than the County's limit of 7 D/T along project property lines.

2 APPENDIX E: ODOR REPORT REVIEW

Appendix E provides an initial Technical Memorandum (July 21st, 2021) as well as an updated Technical Memorandum dated August 11th, 2023. The first analysis resulted in odors at project property lines exceeding El Dorado County's 7 D/T limit. The project was then revised such that hoop houses would be utilized along with a smaller area of outdoor cultivation. Based on the revised project description, the analysis resulted in compliance with the County's 7 D/T limit.

The modelling study utilized an odor concentration of 20 D/T as the odor baseline. The Model was used to determine the attenuation of odors as they are dispersed from the project. This is not a terrible approach considering there are no published emission rates for cannabis odors and odors from cannabis cultivation are highly variable due to several factors. However, the model needs to account for all odor generating activities, be representative of all site operations, and estimate maximum odor conditions.

SCS has reviewed this analysis and have discovered several flaws that lead to severely under predicting odor impacts to the surrounding community. The following are some of the most critical issues:

- 1) The foundation of the model is the 20 D/T odor concentration baseline from which all concentrations are then calculated based upon a modelled dilution factor. This value was determined/estimated based upon less than 30 minutes of measurements at a different outdoor farm that is of smaller size than specified by this project.
 - a. SCS has recorded D/T values at outdoor cannabis farms in excess of 250 D/T and routinely over 50 D/T.
 - b. The 20 D/T baseline estimate was based upon a farm that was 2-weeks out from Harvest. Odor concentrations are likely to increase up to Harvest.
 - c. The estimated 20 D/T was based on very limited measurements, conducted over a very short period of time, and there is no quality justification for using this value at this farm.
- 2) The model did not take into account harvesting and proposed processing activities including on-site drying operations.
 - a. Harvesting operations are some of the most odor intensive activities that can be performed at a cannabis cultivation site. This was not taken into account.

- b. Processing activities such as drying, bucking, trimming are very odor intensive activities and are not taken into account in this analysis. It appears this operation is proposed to be performed in a tent within the cultivation area.
- 3) The analysis states that hoop houses will be installed within the current project and each hoop house would be equipped with a carbon filtration system that would reduce odor intensity below 7 D/T.
 - a. It's unclear how the use hoop houses will reduce odor emissions as they are porous, unsealed, and have no control of the emission points.
 - b. SCS does not see specifications in the odor analysis for carbon filtration. Various types of conditioning systems, fans, and filters are provided but no specifications for carbon filtration are included.

3 REVIEW OF SET BACK REQUIREMENTS

The following is on Page 22 of the MND.

"The El Dorado County Cannabis Ordinance, Section 130.41.200 contains a minimum setback of 800 ft from the property line of the site or public right-of-way for allowing cultivation and processing activities. The project components would not be setback by at least 800 ft from the western property line. However, the applicant is seeking a setback reduction waiver from the County"

The basis of this setback reduction waiver is the Odor Report discussed in Section 2. Since the Odor Report was based upon flawed assumptions, the request for this setback reduction waiver should be reviewed as there is a Residence 745 feet to the Southwest.

4 PROPOSED ODOR MITIGATION MEASURES

The MND includes standards for maximum allowable odors measured by the County at the property line. It also has provisions for mitigation measures to be installed should County measurements exceed the 7 D/T benchmarks. However, it is unclear how the proposed mitigation measures would actually reduce perceived odors in the surrounding communities. In addition, the schedule for installation of the measures is not provided. The following are some additional recommendations for this section:

- 1) Odor masking agents or solutions that include fragrance should not be used for odor control. SCS's experience is that community members would prefer cannabis odors to an unknown chemical agent that adds additional fragrance to the air.
- 2) Require the applicant to specify odor scrubbing/molecular filtration technology to be utilized for odor control in hoop houses along with specifications for odor control efficacy.
- 3) Schedule County compliance testing during Harvesting and processing activities.
- 4) Require third-party testing be performed with County oversight of methods to be employed and timing of tests to insure representativeness with worst case odor conditions.



water facts

1

Ground Water in Fractured Hard Rock

water.ca.gov/publications

California Department of Water Resources
Attn: Publications Office
P.O. Box 942836
Sacramento, CA 94236-0001
(916) 653-1097
imr-publications@water.ca.gov

Free
01/11

In mountainous areas of California, groundwater can be found in the cracks or fractures of hard rocks, such as granite, greenstone, and basalt

The water does not actually penetrate the rocks, because there is no pore space between the grains of the rock. However, some of these rocks have fractures in them. These fractures store water and yield small amounts of water to wells that intersect the fractures.



Some sedimentary rocks, like sandstone, are hard but can still absorb some water into their pores. These rocks may also have fractures that contain water.

About 60 percent of California is composed of hard rocks. However, only a small quantity of groundwater is stored in the fractures of these rocks.

The majority of groundwater is stored in what the average person would call "dirt" or "soil," more accurately described as alluvium (loose gravel, sand, and silt) which has pore spaces between the grains.

Where are the hard rocks?

In general, all mountain and hilly areas of California are composed primarily of hard rocks.

- The Coast Ranges, The Sierra Nevada, and large areas of coastal southern California and southern desert regions consist of granitic and metamorphic, volcanic, and hard sedimentary rocks.
- The northeastern part of California is composed mainly of volcanic rocks.

A thin layer of sediments, soil, or weathered rock covers some of these hard rock formations.

How do rocks become fractured?

Like most fractures, rock fractures are caused by stress. Rocks may fold, faults may move, and rocks may expand when overlying material is removed by erosion and the now-bare rocks are exposed to the weather. Volcanic rocks may also fracture while cooling and contracting. Ice, plant roots, or water flow can enlarge these fractures.

What do the fractures look like?

Fractures may be large or small and may run up and down or sideways. They may be a few millimeters to hundreds of meters long, and range in width from less than a millimeter to several centimeters, but usually occur in a regular pattern.

In carbonate rocks (limestone and dolomite) the fractures may be enlarged into caverns when the rock is dissolved by water.

You'll find most fractures in the upper few hundred feet of rock. This is because the weight of the rock on top inhibits the development of deep fractures. In addition, the deeper you go, the smaller the width of these fractures.

The beautifully sculpted rocks that form Yosemite Valley are the result of glaciation and the removal of rock material along these intersecting fracture surfaces.

How does water get to the rock fracture?

Water that falls on land may run off on the surface in creeks and rivers, or it may infiltrate into the rock materials on the ground. The infiltration of water recharges groundwater

supplies in sandy, loose material and in fractured hard rock.

It is important to note that water occurring in rock fractures have less protection from contamination, compared to alluvial aquifers where the soil acts as a filter treatment.

Why are fractures important for groundwater?

For the most part, fractures are the only way groundwater can be stored in hard rocks. In addition to relatively small amounts of storage, the fractures (particularly intersecting networks of fractures) are the primary conduit for groundwater flow to wells.

Variables that affect water volume:

- size and location of the fractures
- interconnection of the fractures
- amount of material clogging the fractures

Water can also be stored in lava tubes in volcanic rock and in solution openings in carbonate rocks (limestone and dolomite).

How much water is stored in hard rock?

The total volume of water stored in fractured hard rocks near the surface is estimated to be less than 2 percent of the rock volume. This percentage decreases with depth as fractures become narrower and farther apart.

The amount of water in the rocks surrounding a hard rock well is small. Groundwater levels and the well's yield can decline dramatically during the summers of dry years.

In areas where alluvium overlying the hard rock is saturated with water, the alluvium provides additional water storage for nearby wells in the hard rock. The volume of water stored in many alluvial soils can amount to 10-25 percent of the volume of the alluvium. This situation most often occurs in valleys or meadows.

How much water will my well yield?

Half of all hard rock wells yield 10 gallons per minute or less, which is only enough for individual domestic supplies. When conditions are good, wells drilled in fractured rock may yield several hundred gallons per minute when pumped.

Good conditions:

- large amounts of fractures
- good interconnection between fractures
- wide, large, clean fractures
- a source of recharge
- a large quantity of water in storage
- proper installation of the well, including removal of granular debris that may clog the fractures

Some wells may be dry if the above conditions are not met.

How do I know I have a high-yielding well?

You don't. While exploration of the well site may help, you will still face some trial and error that you seldom face when drilling in an alluvial aquifer.

Wells that are close together in alluvial aquifers will probably have similar yields. However, hard rock wells may not have similar yields. You have to be able to drill to a very specific point in a major fracture zone that has a lot of water in it. The water must also be continuously recharged. If these conditions aren't met, then you can easily have a dry hole that is drilled right next to a producing well.

Also, keep in mind that a neighboring well can interfere with your well. How much water passes through fractured rock varies greatly depending on connections between fractures. As a result, interference between neighboring wells is difficult or impossible to predict in advance. The best insurance against such problems is large lot sizes. Wells on lots as large as nine acres have gone dry.

Recent advances such as fracture pattern analysis, borehole imaging, and fracture-flow models will help.

How do I get started?

You need a real expert for well drilling, and even that does not assure that you will hit water, but the odds will be more favorable. If you know a geologist, talk with him or her. Consult a professional well-drilling firm with a California C-57 contractor's license. And remember, once you have your well drilled, pump tests of new wells are necessary to verify the existence of a suitable and sustained water supply. The firm that drilled your well can perform these tests.

For a single family residence, 24 hours of pumping and recovery of the water level to within two feet, or 5% of the static level, depending on the amount of drawdown during pumping, may be adequate. Longer tests are necessary for community supply or industrial wells. Consult with your County well permitting agency for specific water well testing requirements for any type of well.

Where can I get more information?

www.water.ca.gov/groundwater

Integrated Regional Water Management

901 P Street
Sacramento, CA 95814-3515

Northern Region

2440 Main Street
Red Bluff, CA 96080-2398
(530) 529-7300

North Central Region

3500 Industrial Blvd.
West Sacramento, CA 95691
(916) 376-9600

South Central Region

3374 E Shields Avenue
Fresno, CA 93726-6913
(559) 230-3354

Southern Region

770 Fairmont Avenue, Suite 102
Glendale, CA 91203-1035
(818) 543-4600

References

California Department of Water Resources. *California's Groundwater*. Bulletin 118-2003. 2003.

California Department of Water Resources. 1990. *Mountain Counties Water Management Studies, Amador County*.

California Department of Water Resources.. 1983. *Status of Sierra Foothills Water Management Studies*.

California Department of Water Resources. 1974. *Water Quality Investigation of Western Nevada County*.

Heath, Ralph C. 1983. *Basic Groundwater Hydrology*. U.S Geological Survey Water Supply Paper 2220.

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PC 3/28/2024
ITEM # 2

CCUP21-0004/Single Source

Linda Pearsall <linda.pearsall@gmail.com>

Tue 3/26/2024 10:48 PM

To: Planning Department <planning@edcgov.us>

El Dorado County Planning Commission

c/o Evan Mattes, Planner

2850 Fairlane Court

Placerville, CA 95667

Planning @ [edcgov.us](mailto:planning@edcgov.us)

The property owners and residents of River Pines Estates have Substantial Evidence supporting a Fair Argument for Eldorado County to obtain an Environmental Impact Report. We are objecting to the adoption of a Mitigated Negative Declaration for the proposed project.

I live across D'Agostini Drive south of proposed project and have cardiology and pulmonary diagnoses. No reports have been submitted to show that the environmental impact of this project will not negatively impact our health.

The findings of "no odor impact" in the Odor Study did not consider the processing and drying operations that the project is planning. I personally have experienced the odors emitted from only six (6) plants and can attest to the fact that the odors emitted from the number of plants proposed in the project will negatively impact the homeowners in River Pines Estates.

The odor study previously submitted to the county did not appear to have come from an unbiased source and did not submit evidence that the odors will be mitigated by the measures proposed. The study was not done during the hottest months when the drying and processing is done.

Nowhere in the study does it state that carbon air filters are going to be used yet porous hoop houses are being proposed.

Where in the study was it shown that the proposed chemicals will not be carried by the wind and will not negatively impact our health?

Those of us that are older and have chronic conditions need to know we are being protected.

I object to the adoption of the Mitigated Negative Declaration and request that the county obtain an Environmental Impact Report also to address the impact of the noise caused by the fans and sprayers.

Californians are constantly being asked to conserve water yet, El Dorado County is considering approving a water intensive THC Cannabis project. Our area has wells. There is no public water system. What has El Dorado County done or doing to mitigate the negative impact when our wells go dry?

The California Environmental Quality Act was put into place to protect the environment. The El Dorado Planning Commission not only has an obligation to protect the environment but to also do what is best for the people and to protect their quality of life.


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6 PAGES

Reference CCUP21-0004/Single Source

Gary Perez <garyperez1147@gmail.com>

Tue 3/26/2024 11:19 PM

To: Planning Department <planning@edcgov.us>

 2 attachments (168 KB)

Gary PerezCanabis.docx; Assessment of Odor Report_CEQA MND_032524.pdf;

Please add the attached documents to Thursday, 28 March, Planning meeting.

Thank you

GaryPerez

Gary Perez
3059 Squirrel Hollow
Mount Aukum, CA 95656

26th March 2024

VIA E-MAIL

El Dorado County Planning Commission
% Evan Mattes, Planner
2850 Fairlane Court
Placerville, CA 95667
planning@edcgov.us

Re: CCUP21-0004/Single Source (the "Project")

Honorable Members of the Planning Commission:

As a concerned resident of River Pines Estates, whose property is located approximately 2,000 feet from the proposed grow location, I request that the Project should be required to complete an Environmental Impact Review (EIR) because there are multiple issues with the Project. There is evidence supporting a fair argument that the Project will have a significant effect on the environment in multiple areas that a Mitigated Negative Declaration (MND) will not adequately address.

1. The odor study prepared by the Project does not accurately reflect the conditions present at the proposed grow site and therefore underestimates the potential odor. See analysis of odor study by Paul Schafer of SCS Engineers and Environmental Consultants, submitted by counsel to the Committee to Protect River Pines Estates.
2. The proposed mitigation measure, fans and a mister system, have not been shown to be effective as the mister has unidentified chemicals. In my opinion, the mister will not have enough contact with the air to reduce the amount of odor causing chemicals from the cannabis plants. Wind direction changes when weather systems move through the area.
3. The impact of the mister system was not addressed in any other area of the impact report. A large bank of fans, spraying chemicals into the air will affect wildlife, waterways, noise levels, and air quality. None of the sections of the report even mention the existence of the odor mitigation measures, let alone what effect they will have on these other areas.
4. In December when the cannabis is not growing, how can a biological resource report be conducted? Most trees and flowers are not present or dormant. There

are numerous amounts of wildlife; bear, mountain lion, bobcat, deer etc. Also many bird species that inhabit the area would also be affected.

5. Earth Groovy Products did an Acoustic study and an Air Quality study. This company is managed by one of the applicants of the Project. I believe that this is a direct conflict of interest, and the conclusions of these studies should be rejected.

Because of the above reasons, there is evidence that the County Planning Commission should not accept the Mitigated Negative Declaration and instead require the Project to complete a full Environmental Impact Review.

Sincerely,

Gary Perez

March 25th, 2024
File No. 24224153.00

MEMORANDUM

TO: Mr. Todd R. Moore, Hahn & Hahn LLP

FROM: Paul Schafer, Vice President, SCS Engineers

SUBJECT: Review of "Updated Notice of Intent to Adopt A Mitigated Negative Declaration" in
Regards to Potential Odor Impacts from Project CCUP21-0004/Single
Source

1 INTRODUCTION

SCS has been retained by Hahn and Hahn LLP (Client) for support services related to the review of site plans, a dispersion model, odor control plans and the potential impacts of odor emissions from proposed cannabis facility operations in El Dorado County. The project in question is CCUP21-0004/Single Source and the project located on the north side of D-Agostini Drive, approximately 1 mile west of the intersection with Aukum Road, in the Somerset area.

The state of understanding relative to the main cause of odor and, more specifically, the objectionable "Skunky" odor from cannabis emissions and the methods to mediate them from cannabis cultivation is rapidly evolving. Just a few years ago, it was a common perception that the main culprit relative to odors from cannabis operations were terpenes with Myrcene being the main identified culprit. We now know that although Terpenes are a part of the odor profile, they are not the cause of the unpleasant "Skunky" odor character that can be experienced downwind of cannabis operations.

In addition, there are considerable issues and complications that arise when attempting to describe or estimate a facilities potential odor impacts. These include several factors:

- 1) Cannabis, like most plants, has the potential to emit hundreds of different chemicals. Each at various rates, at widely divergent odor detection thresholds, and dependent on several external variables;
- 2) Emission rates are not constant throughout the cannabis plants life cycle or within the plant's daily cycle;
- 3) Emission rates can be influenced by temperature, exposure to light radiation, degree of agitation, plant stresses, among other external factors.
- 4) The ratios of compounds emitted by cannabis are not constant through the plant's life cycle and the times of highest emissions of certain compounds can be decoupled from other types of compounds.

Finally, there are various technologies that have been used and are being vetted for use in regards to odor mitigation from cannabis operations. From enclosed spaces, the technology of choice has been, and continues to be, scrubbing the effluent point through the use of tried and true carbon scrubbers. However, for vented greenhouses that take advantage of the local climate for temperature and humidity controls, the best technology for use in this space is still up for debate. Vapor Phase odor

neutralizers have been used with some success but this technology has limitations and is not looked at favorably by the general public. Standalone carbon scrubbing systems with various pretreatment options have also been shown to be capable of significantly reducing the potential for odor emissions from greenhouse spaces. Each of these technologies, when utilized in open air cultivation/harvesting operations are even less effective as contact with the odorous plume is required.

The following sections review the components of the "Updated Notice of Intent to Adopt A Mitigated Negative Declaration" (MND) in Regards to Potential Odor Impacts and specifically the project – specific Odor Analysis included as Appendix E. This Odor Analysis was the basis of the County's assessment that "No odor Mitigation is required" since the analysis showed impacts less than the County's limit of 7 D/T along project property lines.

2 APPENDIX E: ODOR REPORT REVIEW

Appendix E provides an initial Technical Memorandum (July 21st, 2021) as well as an updated Technical Memorandum dated August 11th, 2023. The first analysis resulted in odors at project property lines exceeding El Dorado County's 7 D/T limit. The project was then revised such that hoop houses would be utilized along with a smaller area of outdoor cultivation. Based on the revised project description, the analysis resulted in compliance with the County's 7 D/T limit.

The modelling study utilized an odor concentration of 20 D/T as the odor baseline. The Model was used to determine the attenuation of odors as they are dispersed from the project. This is not a terrible approach considering there are no published emission rates for cannabis odors and odors from cannabis cultivation are highly variable due to several factors. However, the model needs to account for all odor generating activities, be representative of all site operations, and estimate maximum odor conditions.

SCS has reviewed this analysis and have discovered several flaws that lead to severely under predicting odor impacts to the surrounding community. The following are some of the most critical issues:

- 1) The foundation of the model is the 20 D/T odor concentration baseline from which all concentrations are then calculated based upon a modelled dilution factor. This value was determined/estimated based upon less than 30 minutes of measurements at a different outdoor farm that is of smaller size than specified by this project.
 - a. SCS has recorded D/T values at outdoor cannabis farms in excess of 250 D/T and routinely over 50 D/T.
 - b. The 20 D/T baseline estimate was based upon a farm that was 2-weeks out from Harvest. Odor concentrations are likely to increase up to Harvest.
 - c. The estimated 20 D/T was based on very limited measurements, conducted over a very short period of time, and there is no quality justification for using this value at this farm.
- 2) The model did not take into account harvesting and proposed processing activities including on-site drying operations.
 - a. Harvesting operations are some of the most odor intensive activities that can be performed at a cannabis cultivation site. This was not taken into account.

- b. Processing activities such as drying, bucking, trimming are very odor intensive activities and are not taken into account in this analysis. It appears this operation is proposed to be performed in a tent within the cultivation area.
- 3) The analysis states that hoop houses will be installed within the current project and each hoop house would be equipped with a carbon filtration system that would reduce odor intensity below 7 D/T.
 - a. It's unclear how the use hoop houses will reduce odor emissions as they are porous, unsealed, and have no control of the emission points.
 - b. SCS does not see specifications in the odor analysis for carbon filtration. Various types of conditioning systems, fans, and filters are provided but no specifications for carbon filtration are included.

3 REVIEW OF SET BACK REQUIREMENTS

The following is on Page 22 of the MND.

"The El Dorado County Cannabis Ordinance, Section 130.41.200 contains a minimum setback of 800 ft from the property line of the site or public right-of-way for allowing cultivation and processing activities. The project components would not be setback by at least 800 ft from the western property line. However, the applicant is seeking a setback reduction waiver from the County"

The basis of this setback reduction waiver is the Odor Report discussed in Section 2. Since the Odor Report was based upon flawed assumptions, the request for this setback reduction waiver should be reviewed as there is a Residence 745 feet to the Southwest.

4 PROPOSED ODOR MITIGATION MEASURES

The MND includes standards for maximum allowable odors measured by the County at the property line. It also has provisions for mitigation measures to be installed should County measurements exceed the 7 D/T benchmarks. However, it is unclear how the proposed mitigation measures would actually reduce perceived odors in the surrounding communities. In addition, the schedule for installation of the measures is not provided. The following are some additional recommendations for this section:

- 1) Odor masking agents or solutions that include fragrance should not be used for odor control. SCS's experience is that community members would prefer cannabis odors to an unknown chemical agent that adds additional fragrance to the air.
- 2) Require the applicant to specify odor scrubbing/molecular filtration technology to be utilized for odor control in hoop houses along with specifications for odor control efficacy.
- 3) Schedule County compliance testing during Harvesting and processing activities.
- 4) Require third-party testing be performed with County oversight of methods to be employed and timing of tests to insure representativeness with worst case odor conditions.

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22 PAGES

Re: Fw: CCUP21-0004 Public Comment

C Clary <cclary8786@gmail.com>

Wed 3/27/2024 8:56 AM

To: Planning Department <planning@edcgov.us>

1 attachments (5 MB)

PublicCommentCCUP21-0004 3.27.2024.pdf

Hi,

There was an error on page 4 of the letter I sent yesterday. Since it is not yet published on the registrar, would it be possible to substitute this one instead?

I have the edit in red to make it easy to see the only change which was made.

Thanks so much,

Carolyn Clary

On Tue, Mar 26, 2024 at 2:26 PM Planning Department <planning@edcgov.us> wrote:

Your public comment sent on 03/26/2024 at 2:16 PM has been received for Single Source Solutions (Commercial Cannabis Use Permit) that is on the agenda for the Planning Commission's Meeting on 3/28/2024.

Thank you.

County of El Dorado

Planning and Building Department (Planning Services)

2850 Fairlane Court

Placerville, CA 95667

(530) 621-5355

From: C Clary <cclary8786@gmail.com>

Sent: Tuesday, March 26, 2024 2:16 PM

To: Planning Department <planning@edcgov.us>

Subject: CCUP21-0004 Public Comment

Dear Planning Commissioners,

Please find my letter of public comment regarding CCUP21-0004 to the Planning Commission attached. The hearing for this project is Thursday, March 28, 2024.

I am hopeful that you will take the time to consider the public's thoughtful and fact-based response to this project.

Thank you, in advance, for your time.

Sincerely,

Carolyn Clary

Somerset, CA

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March 25, 2024

Dear Planning Commissioners,

As I am sure you are aware, to meet the Fair Argument Standard, you must require a full EIR if there is substantial evidence supporting a fair argument that there will be a significant environmental impact in a project. I believe there are many flaws in the NMD for this project, and an absence of factual data supporting the "Less than Significant" impact which the County has assessed in several areas.

I am writing in opposition to CCUP21-0004 for the following reasons:

1) Conflict of Interest

Earth Groovy Products, the company which did the air quality technical memo and noise assessment on this project is owned by Rod Miller, who is the Legislative Director of the El Dorado Growers Alliance and a co-applicant on this project. Mr. Pinette is a member of the El Dorado Growers Alliance. Allowing Mr. Miller's company to do these assessments is completely inappropriate and a huge conflict of interest. Earth Groovy Products also did Mr Harde's acoustic assessment for CCUP21-0002. Are you aware of this and is this acceptable to each of you?

2) Inaccurate Odor Study and Inappropriate Mitigation Proposal

The Odor analysis done by Environmental Permitting Specialists (the same company which did Mr. Harde's analysis as well) is flawed, as evidenced by a review of the assessment by Paul Schaefer of SCS Engineers, who is a nationally recognized expert on Ambient Air Monitoring and on Odor Management, and who has extensive experience in assessing odor and odor mitigation in the cannabis industry. Mr. Schaefer has worked with Santa Barbara County which has much more experience with commercial cannabis than El Dorado County does. Mr Schaefer's analysis is that the odor analysis is flawed and the proposed odor mitigation system simply does not work.

Additionally, according to Michael Polson, Director of UC Berkeley Cannabis Research Program, odor and odor mitigation systems in commercial cannabis “are quite understudied”. He had no knowledge of any study supporting the use of this method of odor mitigation.

3) Indiscriminate and Erroneous Use of Variances

Article 4, Title 130, Section 130.41.100.4.C states: “Any setback for a commercial cannabis activity may be reduced in a 130.52. Commercial Cannabis Use Permit **so long as the applicant demonstrates that the actual setback will substantially achieve the purpose of the required setback** and that the parcel was owned or leased by the applicant before voter approval of the ordinance from which this Section is derived on November 6, 2018.” (See Appendix C)

Title 130, Section 130.52.070.D4 states “The granting of the Variance is compatible with the maps, objectives, policies, programs, and general land uses specified in the General Plan and any applicable specific plan, **and not detrimental to the public health, safety, and welfare or injurious to the neighborhood.**”

Title 130.32.060. C. 5 states ““The granting of the Variance is compatible with the maps, objectives, policies, programs, and general land uses specified in the General Plan and any applicable specific plan, **and not detrimental to the public health, safety, and welfare or injurious to the neighborhood.**”

Title 130.61.110 states “Nothing contained within this Chapter shall be construed **to allow a legal nonconforming use to be conducted in such a way as to constitute a public or private nuisance, or a danger to the public health, safety and welfare.**”

The addition of an odor mitigation system as a solution to “substantially achieving the purpose as the setback” is simply wrong and adds potential dangers which would not exist if the setback remained at 800 feet. This mitigation measure adds substances which have not been studied in this application and may very well negatively affect the air and groundwater quality, as well as the health and safety of sensitive receptors who live nearby. You do not have safety data to prove otherwise, and the Biological and Air Quality studies did not include safety data in this

application in the NMD. On March 5, at the Board of Supervisors hearing, Mr. Mattes publicly admitted that the Planning Department does not have safety data for this application of odor neutralizers which are being required by the County as mitigation measures in this project.

The fact that Chris Perry, and Evan Mattes openly admitted at the Board of Supervisors meeting on March 5, 2024 that they do not consider the purpose of the setback if an applicant owned the property before November 6, 2018, is **in direct violation of Article 4, Title 130, Section 130.41.100.4C, and Article 4, Title 130, Section 130.52.070.D4.**

Therefore, this applicant does not meet the criteria to allow a variance from the 800 foot setback, and granting a variance is in direct violation of Title 130.61.110 because you have no evidence that it is not harmful and there is no evidence that granting the variance will not "result in anything which is injurious to safety or health of an entire community or neighborhood, or any considerable number of persons, or unlawfully obstructs the free passage or use, in the customary manner, of any navigable lake, or river, bay, stream, canal, or basin."

4) Insufficient Water Assessment

On March 5th, at the Board of Supervisors appeal hearing for CCUP21-0002 (Mr. Harde's project) Evan Mattes stated that the Environmental Management Department had "signed off" on these projects. Mr. Jeff Warren, Director of the Environmental Management stated that their department does not "sign off" on the project- they merely assess whether the well is tied to a residence and that the waste standard procedures will be followed. They do not provide ANY assessment for appropriate water supplies and the El Dorado Water Agency is not involved either. Why is there no county agency involved in the assessment of the water demands for cannabis and the associated potential for depletion of fractured granite groundwater and groundwater contamination? You simply do not have enough data to assess a "less than significant impact" on the groundwater supplies. **What data was used by the Planning Department to make this assessment in the current project?** Please provide to the public the data for estimating water requirements which the county is using. We have continued to ask for it yet no data has been shown to the public despite it being requested at every Planning Commission meeting for cannabis projects thus far. One of the Commercial Cannabis applicants

in process admitted to me that the estimated water requirements for the projects are merely what the applicant tells the Planning Department they will require. This is unacceptable. This may explain why the 1.2 million gallons per year estimated for Mr. Tannenbaum's 87,000 square foot indoor cannabis project was exactly the same estimate listed in Mr. Harde's 68,000 outdoor project. **There should be a standard formula for how the water estimates are calculated and this should be done by the Planning Dept or Helix.** Data from the State of California on Water from fractured granite (see Appendix A) shows that parcels of less than 9 acres are at risk for going dry by neighboring high water use, which commercial cannabis require. Please show the public the data from Helix and your Planning Department to back up these continued "less than significant" impacts.

5) Insufficient Biologic Resources Assessment

Doing a Biologic Resources Study based on observations in December is inadequate. It does not even cover the harvest period for this project. The assessment **was missing** major portions of our local wildlife, including amphibians, raptors, owls, bobcat, bear, mountain lions and bees. It also neglected to address the nearby waterways including Flat Creek and other seasonal streams. Additionally, it did not include the study of the proposed mitigation measures. Therefore, it is inadequate to deem a "less than significant" impact.

6) Absence of a Security Plan

There is no documentation of a security plan for this project. I have continually heard from the El Dorado Grower's Alliance at Planning Commission and Board of Supervisor meetings that there is no rational reason to be concerned about security for legal cannabis operations. Yet the Cybele Holdings Security Plan in the NMD and Initial Study (Lee Tannenbaum's own project) stated, **"The remote nature, topography, and darkness of the premises provides for reasonably easy access to the premises by those intending to commit a theft or vandalism of cultivation areas."**

Unlike ANY crop being grown here in El Dorado County, only cannabis requires security fencing, video cameras and sheriff sign-off so please stop pretending this is the same as any other crop. What is Single Source's Security Plan? Mr Tannenbaum had an extensive security plan including a security patrol in his NMD and Initial

Study. The neighbors are entitled to know what specifically is being done to ensure their safety related to this project.

You are leaving our county open to many lawsuits by approaching this permit process in the current format with many important issues improperly assessed. It is each of your responsibility to ensure compliance and to protect our community and our environment. **Please deny this permit in it's current form and require a full EIR for this project in order to have a full and accurate understanding of this project's impacts.**

Sincerely,

A handwritten signature in cursive script that reads "Carolyn Clary".

Carolyn Clary

Somerset, CA

Appendix A

Groundwater in Fractured Hard Rock

water facts

1

Ground Water in Fractured Hard Rock

water.ca.gov/publications

California Department of Water Resources
Attn: Publications Office
P.O. Box 942836
Sacramento, CA 94236-0001
(916) 653-1097
imr-publications@water.ca.gov

Free
01/11

In mountainous areas of California, groundwater can be found in the cracks or fractures of hard rocks, such as granite, greenstone, and basalt

The water does not actually penetrate the rocks, because there is no pore space between the grains of the rock. However, some of these rocks have fractures in them. These fractures store water and yield small amounts of water to wells that intersect the fractures.



Some sedimentary rocks, like sandstone, are hard but can still absorb some water into their pores. These rocks may also have fractures that contain water.

About 60 percent of California is composed of hard rocks. However, only a small quantity of groundwater is stored in the fractures of these rocks.

The majority of groundwater is stored in what the average person would call "dirt" or "soil," more accurately described as alluvium (loose gravel, sand, and silt) which has pore spaces between the grains.

Where are the hard rocks?

In general, all mountain and hilly areas of California are composed primarily of hard rocks.

- The Coast Ranges, The Sierra Nevada, and large areas of coastal southern California and southern desert regions consist of granitic and metamorphic, volcanic, and hard sedimentary rocks.
- The northeastern part of California is composed mainly of volcanic rocks.

A thin layer of sediments, soil, or weathered rock covers some of these hard rock formations.

How do rocks become fractured?

Like most fractures, rock fractures are caused by stress. Rocks may fold, faults may move, and rocks may expand when overlying material is removed by erosion and the now-bare rocks are exposed to the weather. Volcanic rocks may also fracture while cooling and contracting. Ice, plant roots, or water flow can enlarge these fractures.

What do the fractures look like?

Fractures may be large or small and may run up and down or sideways. They may be a few millimeters to hundreds of meters long, and range in width from less than a millimeter to several centimeters, but usually occur in a regular pattern.

In carbonate rocks (limestone and dolomite) the fractures may be enlarged into caverns when the rock is dissolved by water.

You'll find most fractures in the upper few hundred feet of rock. This is because the weight of the rock on top inhibits the development of deep fractures. In addition, the deeper you go, the smaller the width of these fractures.

The beautifully sculpted rocks that form Yosemite Valley are the result of glaciation and the removal of rock material along these intersecting fracture surfaces.

How does water get to the rock fracture?

Water that falls on land may run off on the surface in creeks and rivers, or it may infiltrate into the rock materials on the ground. The infiltration of water recharges groundwater

supplies in sandy, loose material and in fractured hard rock.

It is important to note that water occurring in rock fractures have less protection from contamination, compared to alluvial aquifers where the soil acts as a filter treatment.

Why are fractures important for groundwater?

For the most part, fractures are the only way groundwater can be stored in hard rocks. In addition to relatively small amounts of storage, the fractures (particularly intersecting networks of fractures) are the primary conduit for groundwater flow to wells.

Variables that affect water volume:

- size and location of the fractures
- interconnection of the fractures
- amount of material clogging the fractures

Water can also be stored in lava tubes in volcanic rock and in solution openings in carbonate rocks (limestone and dolomite).

How much water is stored in hard rock?

The total volume of water stored in fractured hard rocks near the surface is estimated to be less than 2 percent of the rock volume. This percentage decreases with depth as fractures become narrower and farther apart.

The amount of water in the rocks surrounding a hard rock well is small. Groundwater levels and the well's yield can decline dramatically during the summers of dry years.

In areas where alluvium overlying the hard rock is saturated with water, the alluvium provides additional water storage for nearby wells in the hard rock. The volume of water stored in many alluvial soils can amount to 10-25 percent of the volume of the alluvium. This situation most often occurs in valleys or meadows.

How much water will my well yield?

Half of all hard rock wells yield 10 gallons per minute or less, which is only enough for individual domestic supplies. When conditions are good, wells drilled in fractured rock may yield several hundred gallons per minute when pumped.

Good conditions:

- large amounts of fractures
- good interconnection between fractures
- wide, large, clean fractures
- a source of recharge
- a large quantity of water in storage
- proper installation of the well, including removal of granular debris that may clog the fractures

Some wells may be dry if the above conditions are not met.

How do I know I have a high-yielding well?

You don't. While exploration of the well site may help, you will still face some trial and error that you seldom face when drilling in an alluvial aquifer.

Wells that are close together in alluvial aquifers will probably have similar yields. However, hard rock wells may not have similar yields. You have to be able to drill to a very specific point in a major fracture zone that has a lot of water in it. The water must also be continuously recharged. If these conditions aren't met, then you can easily have a dry hole that is drilled right next to a producing well.

Also, keep in mind that a neighboring well can interfere with your well. How much water passes through fractured rock varies greatly depending on connections between fractures. As a result, interference between neighboring wells is difficult or impossible to predict in advance. The best insurance against such problems is large lot sizes. Wells on lots as large as nine acres have gone dry.

Recent advances such as fracture pattern analysis, borehole imaging, and fracture-flow models will help.

How do I get started?

You need a real expert for well drilling, and even that does not assure that you will hit water, but the odds will be more favorable. If you know a geologist, talk with him or her. Consult a professional well-drilling firm with a California C-57 contractor's license. And remember, once you have your well drilled, pump tests of new wells are necessary to verify the existence of a suitable and sustained water supply. The firm that drilled your well can perform these tests.

For a single family residence, 24 hours of pumping and recovery of the water level to within two feet, or 5% of the static level, depending on the amount of drawdown during pumping, may be adequate. Longer tests are necessary for community supply or industrial wells. Consult with your County well permitting agency for specific water well testing requirements for any type of well.

Where can I get more information?

www.water.ca.gov/groundwater

Integrated Regional Water Management

901 P Street
Sacramento, CA 95814-3515

Northern Region

2440 Main Street
Red Bluff, CA 96080-2398
(530) 529-7300

North Central Region

3500 Industrial Blvd.
West Sacramento, CA 95691
(916) 376-9600

South Central Region

3374 E Shields Avenue
Fresno, CA 93726-6913
(559) 230-3354

Southern Region

770 Fairmont Avenue, Suite 102
Glendale, CA 91203-1035
(818) 543-4600

References

California Department of Water Resources. *California's Groundwater*. Bulletin 118-2003. 2003.

California Department of Water Resources. 1990. *Mountain Counties Water Management Studies, Amador County*.

California Department of Water Resources.. 1983. *Status of Sierra Foothills Water Management Studies*.

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Page, R.W.; Anttila, P.W.; Johnson, K.L.; and Pierce, M.J. 1984. *Groundwater Conditions and Well Yields in Fractured Rocks, Southwestern Nevada County, California*. U.S. Geological Survey Water Resources Investigation 83-4262.



Appendix B

Applicable Variance Ordinances for El Dorado County

Article 4, Title 130, Section 131.41.200. 5. C

C. Setbacks. Outdoor or mixed-light cultivation of commercial cannabis shall be setback a minimum of 800 feet from the property line of the site or public right-of-way and shall be located at least 300 feet from the upland extent of the riparian vegetation of any watercourse.

D. Odor.

"The cultivating, drying, curing, processing, and storing of cannabis shall not adversely affect the health, safety, or enjoyment of property of persons residing near the property on which cannabis is cultivated or processed due to odor that is disturbing to people of normal sensitivity. Any cannabis odor shall not be equal or greater than a seven dilution threshold ("DT") when measured by the County with a field olfactometer at the property line on which the cannabis is cultivated or processed for a minimum of two olfactometer observations not less than 15 minutes apart within a one hour period ("seven DT one hour"). If the odor from cannabis cultivating, drying, curing, processing, or storing violates this subsection, the permittee must reduce the odor below the seven DT one hour at property line threshold within the time required by the County.

Notwithstanding the prior issuance of a permit, the County may require installation of one or more odor control options, which may include but are not limited to the use of a greenhouse or hoop house that includes activated carbon filtration or equivalent odor abatement control equipment on the air exhaust, a vapor-phase odor control

system, increasing the required setback, growing fewer plants, or growing only low odor cannabis strains.

E. Water Source.

Commercial cannabis cultivation may only be permitted if sufficient evidence submitted to the County demonstrates:
(1) there is adequate water supply in the watershed and water rights to serve the cultivation site;

cultivation operations, but not to exceed 1.5 acres of total canopy coverage for that premises, excluding any nursery area.

4. Lots zoned AG, LA, and PA with a premises greater than 25 acres: Up to five percent of the size of the premises per outdoor or mixed-light cultivation operation with a maximum of six outdoor or mixed-light cultivation operations, but not to exceed two acres of total canopy coverage for that premises, excluding any nursery area.
- D. Retail sale. Retail sale of cannabis shall not occur on any premises where cultivation occurs.

5. Cultivation Standards.

- A. In addition to any State requirements by any governing State agency and any site specific requirements in a permit, outdoor or mixed-light cultivation of commercial cannabis shall comply with the following requirements. Any violation of State regulations, site specific requirements in a Commercial Cannabis Use Permit or Commercial Cannabis Annual Operating Permit, or these requirements is subject to enforcement, abatement, and revocation of a County permit under Section 130.41.100 (Commercial Cannabis Activities Permitting and Enforcement) and Section 130.54.090 (Revocation or County Mandated Modification of a Permit).
- B. *Location.* Outdoor or mixed-light commercial cannabis cultivation shall not be located within 1,500 feet from any school, school bus stop, place of worship, park, playground child care center, youth-oriented facility, pre-school, public library, licensed drug or alcohol recovery facility, or licensed sober living facility. Distance shall be measured from the nearest point of the property line of the premises that contains the commercial cultivation to the nearest point of the property line of the enumerated use using a direct straight-line measurement. A new adjacent use does not affect the continuation of an existing use that was permitted and legally established under the standards of this Chapter.
- C. *Setbacks.* Outdoor or mixed-light cultivation of commercial cannabis shall be setback a minimum of 800 feet from the property line of the site or public right-of-way and shall be located at least 300 feet from the upland extent of the riparian vegetation of any watercourse.
- D. *Odor.* The cultivating, drying, curing, processing, and storing of cannabis shall not adversely affect the health, safety, or enjoyment of property of persons residing near the property on which cannabis is cultivated or processed due to odor that is disturbing to people of normal sensitivity. Any cannabis odor shall not be equal or greater than a seven dilution threshold ("DT") when measured by the County with a field olfactometer at the property line on which the cannabis is cultivated or processed for a minimum of two olfactometer observations not less than 15 minutes apart within a one hour period ("seven DT one hour"). If the odor from cannabis cultivating, drying,

curing, processing, or storing violates this subsection, the permittee must reduce the odor below the seven DT one hour at property line threshold within the time required by the County. Notwithstanding the prior issuance of a permit, the County may require installation of one or more odor control options, which may include but are not limited to the use of a greenhouse or hoop house that includes activated carbon filtration or equivalent odor abatement control equipment on the air exhaust, a vapor-phase odor control system, increasing the required setback, growing fewer plants, or growing only low odor cannabis strains. Installation of certain odor control options may require a permit. Any such notice requiring the use of one or more odor control options will provide a deadline for completion and the dilution threshold will be retested upon expiration of that deadline. The continued odor in excess of seven DT one hour upon retesting will constitute a violation of this Section subject to enforcement, abatement, and revocation of a Commercial Cannabis Use Permit and Commercial Cannabis Annual Operating Permit under Section 130.41.100 and Article 5, Section 130.54.090 (Revocation or County Mandated Modification of a Permit).

- E. *Water Source.* Commercial cannabis cultivation may only be permitted if sufficient evidence submitted to the County demonstrates: (1) there is adequate water supply in the watershed and water rights to serve the cultivation site; and (2) all required State permits from the State Water Resources Control Board and any other State agency with jurisdiction. Cultivation of cannabis shall not utilize water that has been or is illegally diverted from any spring, wetland, stream, creek, river, lake, unpermitted well, or body of water. The premises where the cultivation of cannabis takes place shall either be connected to a public water supply or have a County inspected and approved private water source. The activities associated with the cultivation of cannabis shall not create erosion or result in contaminated runoff into any spring, wetland, stream, creek, river, lake, or body of water.
- F. *Water Conservation Measures.* Cannabis cultivation operations shall include adequate measures that minimize the use of water for cultivation at the site. Water conservation measures, including but not limited to underground drip irrigation, soil moisture monitoring, water capture systems, grey water systems, or other equally effective water conservation measures, shall be incorporated into the cultivation operations in order to minimize the use of water where feasible.
- G. *Screening.* Cannabis shall be screened from public view so that no part of a plant can be seen from an adjacent street or adjacent parcel. Screening shall be accomplished by enclosure within a greenhouse or hoop house or by use of fencing or vegetation. All greenhouses, hoop houses, and fences shall comply with all building and zoning codes and any other applicable law or regulation. Greenhouses and hoop houses are the preferred means of screening.
- H. *Security and Wildlife Exclusionary Fencing.* Areas where cannabis is cultivated, the premises on which cannabis is cultivated, or a portion thereof that includes the cultivation area shall be secured by a minimum six-foot high solid wood or chain link

Article 4, Title 130, Section 130.41.100.4.C

Any setback for a commercial cannabis activity may be reduced in a130.52. Commercial Cannabis Use Permit **so long as the applicant demonstrates that the actual setback will substantially achieve the purpose of the required setback** and that the parcel was owned or leased by the applicant before voter approval of the ordinance from which this Section is derived on November 6, 2018.".

Treasurer-Tax Collector means the Treasurer-Tax Collector of the County of El Dorado, his or her deputies, unless another County officer or employee is assigned by resolution of the Board of Supervisors, to perform all or a portion of the duties as listed herein, in which case, the Treasurer-Tax Collector shall interpreted as the person defined in the resolution.

Watts per square foot means the sum of the maximum wattage of all lights identified in the designated canopy area(s) in the cultivation plan divided by the square feet of designated canopy area(s) identified in the cultivation plan.

Youth-oriented facility means any facility that caters to or provides services primarily intended for minors.

3. Permits Required.

No person shall engage in any commercial cannabis activity in the unincorporated areas of the County without a valid Commercial Cannabis Use Permit and Commercial Cannabis Annual Operating Permit.

4. Commercial Cannabis Use Permit.

- A. A Commercial Cannabis Use Permit shall be subject to Article 5 of Title 130 of the County Code (Application Forms, Submittal Process, and Fees), unless provided otherwise herein. It shall be treated as a Conditional Use Permit under Section 130.52.021 (Conditional Use Permits), subject to the public hearing procedures and recommendation from the Planning and Building Director and decision by the Planning Commission.
- B. *Notice to Interested Parties, Cities, and Counties.* Prior to the hearing before the Planning Commission, notice of the application shall be provided pursuant to Section 130.04.015. If a commercial cannabis activity is proposed within a one-half mile radius of an incorporated city or county, notice of and an opportunity to comment on the application for the Commercial Cannabis Use Permit shall be provided to the applicable city or county before the permit is considered by the Planning Commission.
- C. No Commercial Cannabis Use Permit may be granted unless the applicant demonstrates compliance with all standards in the County Code and State law and regulations for the particular commercial cannabis activity. Any setback for a commercial cannabis activity may be reduced in a Commercial Cannabis Use Permit so long as the applicant demonstrates that the actual setback will substantially achieve the purpose of the required setback and that the parcel was owned or leased by the applicant before voter approval of the ordinance from which this Section is derived on November 6, 2018.

130.52.070 D.1-4. Findings Required

D. Findings Required. A Variance shall be granted by the review authority only where all of the following circumstances are found to apply:

1. There are special circumstances or exceptional characteristics or conditions relating to the land, building, or use referred to in the application, which circumstances or conditions do not apply generally to land, buildings, or uses in the vicinity and the same zone;
2. The strict application of the zoning regulations as they apply to the subject property would deprive the subject property of the privileges enjoyed by other property in the vicinity and the same zone (California Government Code Section 65906);
3. A variance granted shall not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated (California Government Code Section 65906); and
4. The granting of the Variance is compatible with the maps, objectives, policies, programs, and general land uses specified in the General Plan and any applicable specific plan, and not detrimental to the public health, safety, and welfare or injurious to the neighborhood.

above, then a CUP may be required at the Director's discretion. The Director's requirement for a CUP instead of a TUP shall be based on the use of permanent structures, repeated nature of the use, and history of similar TUPs on the same site.

130.52.070 Variance

- A. **Content.** This Section describes the process for County consideration of requests to modify certain standards of this Title (Title 130, Zoning Ordinance) when, because of special circumstances applicable to the property, including location, shape, size, surroundings, topography, or other physical features, the strict application of the development standards for the zone denies the property owner rights enjoyed by other property owners in the vicinity and in the same zone.
- B. **Applicability.** A Variance may be granted to modify any development standards as set forth in this Title. A Variance may not be used to authorize a use or activity not otherwise allowed within the zone.
- C. **Approving Authority and CEQA.** The Zoning Administrator shall have the review authority of original jurisdiction for a Variance authorization. The approval of a Variance is a discretionary project pursuant to CEQA.
- D. **Findings Required.** A Variance shall be granted by the review authority only where all of the following circumstances are found to apply:
1. There are special circumstances or exceptional characteristics or conditions relating to the land, building, or use referred to in the application, which circumstances or conditions do not apply generally to land, buildings, or uses in the vicinity and the same zone;
 2. The strict application of the zoning regulations as they apply to the subject property would deprive the subject property of the privileges enjoyed by other property in the vicinity and the same zone (California Government Code Section 65906);
 3. A variance granted shall not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated (California Government Code Section 65906); and
 4. The granting of the Variance is compatible with the maps, objectives, policies, programs, and general land uses specified in the General Plan and any applicable specific plan, and not detrimental to the public health, safety, and welfare or injurious to the neighborhood.
- E. **Conditions of Approval.** In approving a Variance, the review authority may impose any conditions deemed reasonable and necessary to ensure that the approval will

130.61.110 Public and Safety Nuisance

Definition: "Public safety and nuisance" as related to Section 130.32.060 (Variance Procedures) of this Chapter, means that the granting of a variance must not result in anything which is injurious to safety or health of an entire community or neighborhood, or any considerable number of persons, or unlawfully obstructs the free passage or use, in the customary manner, of any navigable lake, or river, bay, stream, canal, or basin.

Nothing contained within this Chapter shall be construed to allow a legal nonconforming use **to be conducted in such a way as to constitute a public or private nuisance, or a danger to the public health, safety and welfare.**

1. Positive action(s) will be taken to resume the nonconforming use within a reasonable period;
2. The nature and character of proposed structure(s) are substantially the same as that for which the structure(s) were originally designed;
3. There is no material difference in the quality, character or degree of use;
4. The proposed use will not adversely affect the other uses allowed by right in the Zone Districts of adjacent parcels; and
5. The nonconforming use will not be detrimental to the public health, safety or welfare or be injurious to the neighborhood.

If in the opinion of the Director, restoration of the abandoned nonconforming use could contain potentially significant environmental impacts subject to CEQA or if the above findings cannot be made, a Conditional Use Permit (CUP) shall be required from the Commission pursuant to Article 5 (Planning Permit Processing) of this Title to consider restoration of the nonconforming use.

130.61.110 Public or Private Nuisance

Nothing contained within this Chapter shall be construed to allow a legal nonconforming use to be conducted in such a way as to constitute a public or private nuisance, or a danger to the public health, safety and welfare.

PC 3/28/2024
ITEM # 2
4 PAGES

CCUP21-0004/Single Source (the "Project")

Mike Gorvad <mikegorvad@gmail.com>

Wed 3/27/2024 11:06 AM

To: Planning Department <planning@edcgov.us>

Kathleen Gorvad

6804 Flat Creek Drive

Somerset, CA 95684

26th March 2024

VIA E-MAIL

El Dorado County Planning Commission

Evan Mattes, Planner

2850 Fairlane Court

Placerville, CA 95667

planning@edcgov.us

RE: CCUP21-0004/Single Source (the "Project")

Planning Commission:

I live at 6804 Flat Creek Dr. in River Pines Estates and want to express the shock and horror I'm feeling at the very thought of a pot farm in our backyard.

We moved here for many reasons. What we got was a whole lot more. We found a peaceful neighborhood filled with an eclectic collection of people, all quietly and peacefully enjoying our little corner of the world ...

friendly, caring, family oriented, hard working, reliable, productive, responsible, established neighbors.

Our family and friends could visit and enjoy not only the beauty, but the fresh air and an atmosphere of safety. All of that now stands at risk.

But that is not all that is at risk.

Because then we were notified of plans for a conglomerate to move in (with Michael Pinette's full support) and change everything. From its inception, River Pines Estates was intended to be a rural, residential community where activities would be consistent with the well-being of the entire development and respectful of the natural resources and ecosystems. Yes, we have willingly and strong-heartedly survived many of the struggles of nature, but to allow a pot farm, that has not met or has completely failed to address the standards of compliance established by the county, to be imposed on us is unconscionable.

Without apology, I am speaking from the heart.

Others have submitted ample and detailed documentation of the concerns and how they have not been addressed by those proposing this pot farm project.

There was a time when second-hand cigarette smoke was considered harmless.

There was a time when all fertilizers were deemed safe.

There was a time when the welfare of others meant something.

Now I cannot think of our grandchildren enjoying what should be the great outdoors when we may be blindly exposing them to the fallout and runoff from pot farming.

And as of yet, health issues have not been addressed.

In addition, all you have to do is search "pot farming" anywhere and you will find an endless supply of information, mostly negative, regarding the effects on:

- air pollution - traffic issues
- ground water pollution - road maintenance issues
- light pollution - safety issues

Safety issues include, but are not limited to:

- personal property
- attracting those who otherwise would not be interested in RPE

Surely you remember some problems directly related to pot growing/distribution that have occurred in Somerset.

- a police action on at least one property
- a tragic and fatal shooting of a police officer on another

Until we have all the completely verified information from mitigation efforts, based on legitimate studies, and compliance to established regulations, how can this project be moved forward?

/s/ Kathleen Gorvad

Kathleen Gorvad

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PC 3/28/2024
ITEM # 2
3 PAGES


Letter to County Bldg & Planning Dept - River Pines Estates Marijuana Farm

Courtney Thomas <courtneyrosethomas@hotmail.com>

Wed 3/27/2024 11:33 AM

To: Planning Department <planning@edcgov.us>

Cc: Traci Thomas <jtctthomas@sbcglobal.net>

 1 attachments (27 KB)

Letter to County_3-27-24.pdf;

Hello,

Please see the attached letter on behalf of Traci & Jeff Thomas.

Courtney Thomas, P.E.

(530) 417-7861

THOMAS HOUSEHOLD

March 27, 2024

County of El Dorado Planning and Building Department
Attn: Evan Mattes, County Planner
2850 Fairlane Court Placerville, CA 95667
planning@edcgov.us

Dear Mr. Mattes:

I am writing to express my deep concerns regarding the proposed commercial marijuana farm in our neighborhood. As a resident of **River Pines Estates**, I strongly oppose the development of such a facility for several reasons.

Impact on Property Values: According to a study published in the "Journal of Urban Economics," proximity to a commercial marijuana facility can lead to a decrease in property values by up to 4-7%. This would have significant financial implications for homeowners in our neighborhood.

(Smith, J., Johnson, R., & Lee, K. (2019). The impact of commercial marijuana production on residential property values: Evidence from Denver, Colorado. Journal of Urban Economics, 108, 89-102).

Safety Concerns: Research from the National Institute on Drug Abuse (NIDA) highlights the potential safety risks associated with commercial marijuana cultivation. These facilities can attract criminal activity, including theft and vandalism, posing a serious threat to community safety.

(National Institute on Drug Abuse. (2020). Marijuana Research Report. Retrieved from <https://www.drugabuse.gov/publications/research-reports/marijuana>).

Environmental Impact: A report by the Environmental Protection Agency (EPA) outlines the environmental concerns associated with commercial marijuana cultivation, including excessive water usage, energy consumption, and pesticide contamination. These practices could harm local ecosystems and water resources.

(U.S. Environmental Protection Agency. Marijuana Cultivation. Retrieved from https://www.doi.gov/ocl/hearings/112/MarijuanaCultivation_120711).

Quality of Life: Studies cited by the American Planning Association (APA) indicate that commercial marijuana facilities can have negative effects on the quality of life in surrounding neighborhoods, including increased traffic congestion, noise pollution, and unpleasant odors.

(American Planning Association. (2018). Commercial Cannabis: How Local Regulations Impact Our Communities. Retrieved from <https://www.planning.org/events/activity/9116040/>)

5207 D'Agostini Drive, Mount Aukum, CA 95656

530-417-5999 | jttcthomas@sbcglobal.net

24-0520 Public Comment
PC Rcvd 03-27-24

I urge you to reconsider the decision to proceed with the proposed marijuana farm and explore alternative locations that are more suitable for such activities. Our neighborhood is not an appropriate site for commercial cannabis cultivation and allowing it to proceed would be detrimental to the well-being of residents.

Thank you for considering my concerns. I respectfully request that you take action to prevent the establishment of a commercial marijuana farm in our neighborhood.

Sincerely,

Traci & Jeff Thomas

5207 D'Agostini Drive, Mount Aukum, CA 95656

530-417-5999 | jttcthomas@sbcglobal.net

PC 3/28/2024
REM #2
5 PAGES

CCUP21-0004/Single Source Project - Objection to and Request for Environmental Impact Report/Denial of Project

Allison Lawrence <ALawrence@TysonMendes.com>

Wed 3/27/2024 12:38 PM

To: Planning Department <planning@edcgov.us>

1 attachments (365 KB)

2024.03.27 Corr. to PC re CCUP21-0004.pdf;

Dear Honorable Members of the Planning Commission:

Please see the attached correspondence on behalf of my client, Ms. Lisa Bacciarini, regarding the CCUP21-0004/Single Source Project which is set to be addressed at tomorrow's meeting set for 8:30 a.m.

Please do not hesitate to contact me should you have any questions.

Thank you,



Allison M. Lawrence, Esq.

Partner

371 Bel Marin Keys Blvd., Suite 100
Novato, CA 94949

Main: 628.253.5070

Cell: 209.499.0569

Direct: 628.253.5074

alawrence@tysonmendes.com

www.tysonmendes.com

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TYSON & MENDES

371 BEL MARIN KEYS BLVD. SUITE 100, NOVATO, CA 94949
OFFICE: (628) 253-5070 FAX: (415) 785-3165

ALLISON M. LAWRENCE
ALAWRENCE@TYSONMENDES.COM
DIRECT: 628-253-5070



March 26, 2024

VIA E-MAIL ONLY

El Dorado County Planning
Commission c/o Evan Mattes,
Planner
2850 Fairlane Court
Placerville, CA 95667
planning@edcgov.us

Re: CCUP21-0004/Single Source Project

Dear Honorable Members of the Planning Commission:

I represent Ms. Lisa Bacciarini with respect to an objection to and request for Environmental Impact Report/denial of the CCUP21-0004/Single Source Project (hereinafter "SS Project"). Ms. Bacciarini is a resident of River Pines Estates, the community directly impacted by the SS Project. Her property address is at 5021 D'Agostini Drive, which is located directly adjacent to where the applicant intends to place and operate the SS Project. Thus, my client's interests with respect to the SS Project are directly impacted and must be considered.

I have reviewed the documentation submitted in support of the project and have noted several fatal flaws with the studies and conditions surrounding it. Please allow this letter to serve as Ms. Bacciarini's formal objection to the adoption of a Mitigated Negative Declaration (hereinafter "MND"). We formally request that the County obtains an Environmental Impact Report (hereinafter "EIR") for the various and compelling reasons outlined in this correspondence. Even if the EIR is not obtained and the MND is adopted, Ms. Bacciarini urges this Commission to deny CCUP21-004 on the additional grounds outlined below.

1. There is Clear Need for an Environmental Impact Report.

a. Odor

As the Commission is aware, the California Environmental Quality Act ("CEQA") is "a comprehensive scheme designed to provide long-term protection to the environment." (*Los Angeles Waterkeeper v. State Water Resources Control Bd.* (2023) 92 Cal.App.5th 230, 285.) It requires public agencies to undertake an environmental review of proposed projects that require discretionary approval. (Pub. Resources Code, § 21080, subd. (a).) The heart of CEQA

lies in the EIR. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1123 In addition, “[A] public agency must prepare an EIR whenever substantial evidence supports a fair argument that a proposed project ‘may have a significant effect on the environment.’ [Citations.]” (*Ibid.*)

To start, the odor study submitted by the applicant is flawed in several respects. The study notes fans and a mister system will be implemented to address any odor concerns. Glaringly, there is no discernable information regarding the chemicals which will be used in conjunction with the mister system. It is the applicant’s burden to show the mitigation measures to be taken will *actually* cure the odor issues which will come with the SS Project. As written, there is no scientific evidence that the measures will alleviate the odor or that the chemicals used will not simply emit a different damaging odor. The study also fails to address what impact the chemicals will have on surrounding wildlife, noise, health of the community, etc.

Additionally, the study contemplates the use of “hoop houses” to remedy odor issues. The use of these hoop houses still does not appear to remedy the odor issue. Hoop houses are porous, and odor will still escape them. The study does not address this concern at all.

Thus, at the very least, an EIR to address the concerns with odor and the chemicals the applicant claims will reduce them is necessary.

It should also be noted that after additional research, it appears the initial studies were conducted by a company called “Earth Groovy Products.” This company is managed by one of the applicants of the SS Project and thus no other conclusion can be made but that the study is biased and flawed based on this glaring conflict of interest. According to California Secretary of State records, Mr. Rod Miller controls this entity. Mr. Miller is listed as one of the SS Project’s applicants. Thus, the findings and conclusions of these studies should be wholly disregarded, and the Commission should require a neutral, third party to conduct them to ensure fairness and adequacy. Failure to do so is clearly in violation of applicable law.

b. Water

As stated, my client’s property is directly adjacent to where the SS Project will be operated. Her property is serviced by a well which draws water from small fractures in bedrock that hold a finite amount of water rather than a groundwater aquifer. The SS Project and the residential properties which surround it all share this groundwater aquifer.

The project’s initial study is fatally flawed with respect to its analysis of the project’s effect on the water supply in the community. First, the study is completely silent on the estimate of the amount of water the project will utilize. When reviewing the application, the applicant’s well is noted to have produced 50 gallons per minute when first drilled in 1999. By the applicant’s own admission his well only produces 35 gallons per minute now. The cited reason for this decrease is due to the plating of ten acres of vineyards on the property. If ten acres of vineyards had this drastic effect on the water supply, there an analysis of the effect the cannabis cultivation would have on the water supply must be conducted in order for the SS Project to be approved. Without it, there is

substantial risk that the adjacent properties' water supply will be greatly damaged (if not obliterated) by the SS Project.

c. Acoustics

As with the odor "study" it appears the initial acoustics and air quality studies were conducted by applicants' biased company "Earth Groovy Products." In addition to bias, neither Mr. Miller nor his company have any discernible qualifications to study and opine on acoustical (or odor related for that matter) environmental impacts. This is likely why the "study" is silent on the SS Project's effect on noise in the area. As with the odor studies, the Commission should require a neutral, third party to conduct an acoustics analysis to ensure fairness and adequacy.

Thus, based on the above, it is clear there is substantial evidence to support a fair argument that the project will (not may) have a significant effect on the environment and an EIR must be obtained according to applicable and controlling law.

2. The Commission Should Deny the SS Project Application Because it Does Not Comply with Applicable Community Standards.

The SS Project (as with all commercial cannabis cultivation/growing) is not allowed as a matter of right in El Dorado County. In order for the County to issue a conditional use permit, an applicant must show that the proposed project will comply with each and every standard set forth in Section 130.41.200 of the County Code.

Here, the SS Project's application fails miserably in several ways including but not limited to:

1. The SS Project does not meet the odor emission requirements of Section 130.41.200(5)(D);
2. The SS Project does not meet the water supply requirements of Section 130.41.200(5)(E);
3. The SS Project does not comply with the requirement that it incorporate water conservation measures as required by Section 130.41.200(5)(F);
4. The SS Project does not comply with the requirement that it demonstrate its electrical needs will be met from a "100% renewable energy" source as required by Section 130.41.200(5)(I); and,
5. The SS Project does not comply with the setback requirements outlined in Section 130.41.200(5)(C).

Thus, even if the Commission declines to issue an EIR (which in this instance is required based on the flawed initial studies), the Commission must deny approval of the SS Project due to its clear-cut failure to meet the requirements of the County's Commercial Cannabis Cultivation code.

My client greatly appreciates the Commission's consideration of the above factors and arguments in this matter. Please do not hesitate to contact me should any further information be required. I can be reached directly at (628) 253-5074.

Very Truly Yours,

/s/ Allison M. Lawrence

Allison M. Lawrence
Tyson & Mendes LLP


PC 3/28/2024
ITEM # 2
3 PAGES

Letter to Planning Commission concerning Single Source proposed cannabis cultivation

Susie Vasquez <mfp48@gmail.com>

Wed 3/27/2024 1:36 PM

To: Planning Department <planning@edcgov.us>

 1 attachments (17 KB)

Blank 19.pdf;

Sent from my iPad

El Dorado County Planning Commission
Evan Mattis
2850 Fair Lane
Placerville, Ca
March 27, 2024

Dear Planning Commission,

My name is Susie Vasquez, and my home is due north of Mike Pinette, just across the street. I read your report concerning the birds seen during your studies of his property, and would like to add a few more bird species to the ones you listed.

We have a red-tailed Hawk that perches on the power lines nearby. Egrets and Great Grey Herons gather around the pond next door and at night, you can hear the soft hoots of the owls. We also have Canadian geese, wild turkeys and turkey vultures.

If you really look, this area is rich with wildlife. Unfortunately, the demands of cannabis can have a serious impact on the resources that allow wildlife to thrive.

According to California's Department of Fish and Wildlife:

"The combination of limited water resources, a water-hungry crop, and cultivation in sensitive ecosystems means that marijuana cultivation can have environmental impacts that are disproportionately large given the area under production."

Successful cannabis cultivation requires a host of pesticides, fungicides, herbicides and rodenticides, all of which will take a toll on our wildlife.

The direct effect of pesticides alone includes everything from acute poisoning to endocrine disruption, altered morphology and changes in behavior.

Pesticide use is the most important indicator of grassland bird decline, according to Fish and Wildlife.

"Pesticides indirectly impact wildlife through reduction of food resources and refuges, starvation due to loss of prey availability, hypothermia and secondary poisoning."

Rodenticides work by inhibiting clotting, leading to death. Rodenticides have serious impacts on those at the top of the food chain, like the red-tailed Hawk.

If they aren't sickened by the poisons they get from contaminated prey, they will be put at risk of starvation due to loss of food supply. The carnivores of concern were listed in the California Fish and Wildlife study as the Sierra Nevada Red Fox and Gray Wolf, Northern Spotted Owl, California Owl and Great Gray Owl.

Cannabis demands for water, upwards of six gallons per plant per day, will put a strain not only on neighboring wells, but on the environment.

"Four of the five greatest threats to freshwater biodiversity today are flow modification, water pollution, habitat degradation and species invasions. All four are common consequences of cannabis cultivation."

Cannabis is a nutrient-intensive crop. More than 30 soil amendments, from applied nutrient sprays to pesticides, rodenticides, herbicides fungicides and insecticides can be applied, ultimately ending up in the environment's reduced water supply," according to Fish and Game.

"If the polluted water continues to be used, it will add contaminants to the soil, as well as surface and ground water, and ultimately the food chain," according to a study by the Journal of Cannabis Research.

Local government entities must sometimes make decisions that are contentious, but it is usually for the common good, like an extended airport runway.
There is no common good here. Our property values are going down and our roads will still need work. And in all likelihood, the owls and other wildlife will suffer.

Susan Vasquez
3021 Squirrel Hollow
Mount Aukum, California 95656

PC 3/28/2024
ITEM #2
3 PAGES

Agenda item 24-0520 March 28, 2024

kevinwmccarty@pm.me <kevinwmccarty@pm.me>

Wed 3/27/2024 1:53 PM

To: Planning Department <planning@edcgov.us>

📎 1 attachments (136 KB)

Archon Farms Inc - Public Comment - Planning Commission Agenda Item 24-0520 - Single Source - 03.26.2024 - Signed.pdf;

ATTN: El Dorado County, Planning Commission Staff:

Attached is a letter submitted as a public comment on Agenda Item #2, file #24-0520, related to Single Source Solutions (Commercial Cannabis Use Permit CCUP21-0004) request for the construction and operation of a cannabis cultivation facility for medical and adult-use recreational cannabis.

Please ensure this public comment is added to the record and included for consideration during the Planning Commission meeting set for tomorrow / Thursday, March 28th, 2024.

Regards,

Kevin McCarty
CEO / Managing Member



t: (775) 240-3055
e: kevinwmccarty@pm.me
a: Archon Holdings LLC,
701 12th Street,
Sacramento, CA 95814



Archon Farms, Inc.
701 12th St, Ste 202
Sacramento, CA 95814

March 26, 2024

El Dorado County
Planning Commission
2850 Fairlane Court, Building C
Placerville, CA 95667

ATTN: El Dorado County, Planning Commissioners:

This message is regarding Agenda Item #24-0520 related to Single Source Solutions (Commercial Cannabis Use Permit CCUP21-0004) request for the construction and operation of a cannabis cultivation facility for medical and adult-use recreational cannabis.

We would like to address some of the other public comments made by community members pertaining to this project and several other similar projects over the last year. There exists a great deal of misinformation regarding potential impacts from legal, regulated commercial cannabis operations, and many residents' fears are the result of falsely conflating them with their illegal, unregulated counterparts.

First, water usage has been a consistent concern expressed by residents. Two aspects which introduce a confusion are A) indoor versus outdoor cultivation facilities, and B) use rates per plant versus per square foot of canopy. Some facilities do in fact have heavy water consumption compared to other crops. However, these are all indoor hydroponic operations utilizing porous growth media, designed to intake high levels of nutrients and induce greater biomass and cannabinoid yield. Soil medium, on the other hand, absorbs water and an outdoor project such as Single Source will consume water on par with many other agricultural crops which are grown by-right in our county, including apples and wine grapes.

Analyzing water use based on plant quantity versus square feet of canopy also distorts perception of demand for a cultivation facility. Cannabis plants can be grown with a large footprint at smaller quantities, or with a small footprint at greater quantities. Obviously, a baseline rate of gallons per plant is inappropriate as a "one size fits all" metric. On March 25th a resident submitted an article (Zheng et al, 2021) referencing outdoor rates at peak demand months (August, September) of 0.17 to 0.24 gallons per square foot of canopy. Mr. Tannenbaum submitted a separate study with monthly demand profiles showing an average of 0.17 to 0.21 gal / sq. ft. for the same peak months. Average demand over the course of the growth cycle (150 – 160 days) ranges 0.1 – 0.15 gallons per square foot per day. For this project, 0.12 gallons x 160 days x 87,120 sq. ft. = 1.67 million gallons per year. As noted by Mr. Tannenbaum, wine grapes currently consume over 3 billion gallons per year, and this project is relatively insignificant even though it is the largest cultivation premises (2 acres) currently authorized under the County ordinance.

Second, the notion of decreased residential property values. This is a common concern by residents in jurisdictions opening to legal cannabis production. It is easy to understand, as one's home is the primary vehicle for financial equity for most Americans. With that said, the Sacramento Comprehensive Cannabis Study published in 2022 by Economic & Planning Systems (aka "EPS Report") studied this aspect in detail and found no statistical correlation between cannabis production and home values. To quote, "overall, the analysis found that homes within one-quarter mile did not suffer any decrease in home value relative to their neighbors slightly farther away." (EPS, page 114) Without any basis other than fear-based speculation, the Commission ought to dispense with this objection in rendering its judgment.

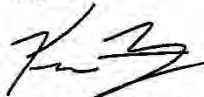
Third, the notion of increased crime. As with the above point regarding home values, this is one of the most common concerns and unsupported by any scientific analysis. The criminal nature of illegal grow sites should not be superimposed upon legal operators spending exhaustive time and resources ensuring compliance with the myriad applicable local and State laws. While cannabis businesses can present an attractive target for thieves, the coordination among operators and local law enforcement agencies has proven an effective deterrent for crime even in urban environments such as Sacramento. Per the EPS report, "the proliferation of cannabis businesses in Sacramento has not generated a proportional increase in crimes targeting these businesses, suggesting that the enhanced security measures employed by these businesses are a strong deterrent to crime." (EPS, page 125) Since the applicant has met all the strict standards set by our Sheriff's Office, the Commission ought to set aside this objection as well.

Lastly, some concerned residents reference the River Pines Estates ("RPE") Covenants, Conditions and Restrictions (CC&R) prohibiting the presence of any commercial use within the subject parcels. They reference Article IV, Section 4.1, yet the text clearly qualifies the restriction to allow the use under consideration today: "No other use is allowed except as specifically permitted by Declarant and local ordinance." The residents also claim restriction based on the project being "noxious, harmful, or unreasonably offensive to other owners" however the evidence is presented is largely conjectural and speculative. The odor study completed by Paul Schafer of SCS Engineers does not in fact contradict the odor study included with the application, but merely questions some of its assumptions and offers additional mitigation measures should the thresholds in the county's ordinance be exceeded. It is reasonable to retain these suggestions should this violation occur, but it is unreasonable to deny this project on the basis of odor concerns.

In summary, this project is well-presented and exhaustively studied, with more than adequate measures included to address the community's valid concerns. It is a discretionary use categorically permitted in the Limited Agriculture (LA-20) zone, and fully compliant with applicable County ordinance. We advise the Commission to honor its Planning staff recommendation and approved the Mitigated Negative Declaration (MND) and Commercial Cannabis Use Permit (CCUP) as presented today.

Thank you for your time and consideration.

Regards,



Kevin W. McCarty

CEO / President, Archon Farms, Inc.

Member, El Dorado County Growers Alliance

PC 3/28/2024
ITEM # 2

Fw: Proposed pot farm on D'Agostini Drive

Building Department <bldgdept@edcgov.us>

Wed 3/27/2024 2:17 PM

To: Planning Department <planning@edcgov.us>

From: Carole Thompson <carole@cwo.com>

Sent: Wednesday, March 27, 2024 1:57 PM

To: Building Department <bldgdept@edcgov.us>

Subject: Proposed pot farm on D'Agostini Drive

I am Carole L. Thompson and have lived in Eldorado county on 7041 Bertone Drive for 24 years. This community is a safe and friendly community for us. With this proposed pot farm, it only raises the possibility of an increased crime, traffic and an interruption to our peaceful community.

As a mental health professional, I am acutely aware of the negative impact that stress, anxiety, and depression can have on individuals and communities. The introduction of a pot farm could exacerbate these issues and undermine the overall well-being of our neighborhood.

Furthermore, the prospect of increased traffic is alarming. Our community was not designed to accommodate the influx of vehicles that such a facility would inevitably bring. This raises significant safety concerns for residents, particularly children and elderly individuals who frequently utilize our streets.

I chose to reside in this area precisely because of its peaceful environment and sense of security. The implementation of a pot farm would directly contradict these qualities and jeopardize the quality of life for myself and my neighbors.

In conclusion, I urge you to reconsider the approval of the proposed pot farm on D'Agostini. The potential consequences on our community far outweigh any potential benefits. Thank you for considering my concerns.

Sincerely,

Carole L. Thompson

7041 Bertone Dr

916-212-2932

Sent from [Mail](#) for Windows

PC 3/28/2024
ITEM #2
3 PAGES

Additional Item for Public Comment RE: CCUP21-0004

C Clary <cclary8786@gmail.com>

Wed 3/27/2024 2:56 PM

To: Planning Department <planning@edcgov.us>


 2 attachments (3 MB)

image1.jpeg; image0 (2).jpeg;

Dear Planning Commissioners,

It has come to my attention that Commissioner Boeger received a 2024 Supervisor election campaign donation from Mr. Rod Miller, owner of Earth Groovy Products, who did the noise technical memo and air quality report for Single Source.

It would appear that this would be a conflict of interest for Commissioner Boeger to vote on this project in addition to the conflict of interest involving Single Source's use of Earth Groovy Products in providing the noise technical memo and air quality assessment for CCUP21-0004.

Please find the evidence of this donation attached.

Thanks very much.

Sincerely,

Carolyn Clary

Somerset, CA

Recipient Committee
Campaign Statement
Cover Page

COPY

COVER PAGE

CALIFORNIA
FORM 460

Date Stamp

Filed Date:
02/22/2024 03:43
PM

Page 1 of 21
For Official Use Only

SEE INSTRUCTIONS ON REVERSE

Statement covers period
from 01/21/2024
through 02/17/2024

Date of election if applicable:
(Month Day Year)
03/05/2024

1. Type of Recipient Committee: All Committees - Complete Parts 1, 2, 3, and 4.

- ☒ Officeholder, Candidate Controlled Committee
☐ State Candidate Election Committee
☐ Recall
(Also Complete Part 5)
☐ General Purpose Committee
☐ Sponsored
☐ Small Contributor Committee
☐ Political Party/Central Committee
- ☐ Primarily Formed Ballot Measure Committee
☐ Controlled
☐ Sponsored
(Also Complete Part 6)
☐ Primarily Formed Candidate/Officeholder Committee
(Also Complete Part 7)

2. Type of Statement:

- ☒ Preelection Statement
☐ Semi-annual Statement
☐ Termination Statement
(Also file a Form 410 Termination)
☐ Amendment (Explain below)
- ☐ Quarterly Statement
☐ Special Odd-Year Report

3. Committee Information

I.D. NUMBER 1460904

COMMITTEE NAME (OR CANDIDATE'S NAME IF NO COMMITTEE)

Lexi Boeger for Supervisor 2024

STREET ADDRESS (NO P.O. BOX)
5445 Madison Avenue

CITY STATE ZIP CODE AREA CODE/PHONE
Sacramento CA 95841 (916)348-9100

MAILING ADDRESS (IF DIFFERENT) (NO AND STREET OR P.O. BOX)

CITY STATE ZIP CODE AREA CODE/PHONE

OPTIONAL FAX / E-MAIL ADDRESS

(916)348-9111 campaigns@rcbs.us

Treasurer(s)

NAME OF TREASURER

Denise Lewis

MAILING ADDRESS

5445 Madison Avenue

CITY STATE ZIP CODE AREA CODE/PHONE
Sacramento CA 95841 (916)348-9100

NAME OF ASSISTANT TREASURER, IF ANY

Marissa Russell

MAILING ADDRESS

5445 Madison Avenue

CITY STATE ZIP CODE AREA CODE/PHONE
Sacramento CA 95841 (916)348-9100

OPTIONAL FAX / E-MAIL ADDRESS

4. Verification

I have used all reasonable diligence in preparing and reviewing this statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 02/22/2024
Date

Executed on 02/22/2024
Date

Executed on
Date

Executed on
Date

By Denise Lewis

Signature of Treasurer or Assistant Treasurer

By Lexi Boeger

Signature of Controlling Officeholder, Candidate, State Measure Proponent or Responsible Officer of Sponsor

By

Signature of Controlling Officeholder, Candidate, State Measure Proponent

By

Signature of Controlling Officeholder, Candidate, State Measure Proponent

FPPC Form 460 (Jan/2018)
FPPC Advice: advice@fppc.ca.gov (866)278-3772
www.fppc.ca.gov

Schedule A (Continuation Sheet)
Monetary Contributions Received

Amounts may be rounded
to whole dollars.

SCHEDULE A (CONT.)

Statement covers period		CALIFORNIA FORM 460
from	01/21/2024	
through	02/17/2024	Page 8 of 21

NAME OF FILER

Lexi Boeger for Supervisor 2024

ID NUMBER
1460904

DATE RECEIVED	FULL NAME, STREET ADDRESS AND ZIP CODE OF CONTRIBUTOR (IF COMMITTEE, ALSO ENTER I.D. NUMBER)	CONTRIBUTOR CODE *	IF AN INDIVIDUAL ENTER OCCUPATION AND EMPLOYER (IF SELF-EMPLOYED, ENTER NAME OF BUSINESS)	AMOUNT RECEIVED THIS PERIOD	CUMULATIVE TO DATE CALENDAR YEAR (JAN 1 - DEC 31)	PER ELECTION TO DATE (IF REQUIRED)
1/23/2024	Rodney Miller 6170 Oak Ridge Circle El Dorado CA 95623	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired n/a	300.00	300.00	519.00 P-24
2/4/2024	Arthur I Molho 311 Diane Street Placerville CA 95667	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired n/a	100.00	100.00	100.00 P-24
2/9/2024	Shanna L Payne 856 Tombstone Ct Oakland CA 94619	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired n/a	100.00	100.00	100.00 P-24
1/22/2024	PUBA Properties 1166 Broadway, Suite N Placerville CA 95667	<input type="checkbox"/> IND <input type="checkbox"/> COM <input checked="" type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC		500.00	500.00	3,000.00 P-24
2/5/2024	Robert F Scharpf 8548 Mosquito Rd Placerville CA 95667	<input checked="" type="checkbox"/> IND <input type="checkbox"/> COM <input type="checkbox"/> OTH <input type="checkbox"/> PTY <input type="checkbox"/> SCC	Retired n/a	500.00	500.00	500.00 P-24
SUBTOTAL \$				1,500.00		

*Contributor Codes
IND - Individual
COM - Recipient Committee
(other than PTY or SCC)
OTH - Other (e.g., business entity)
PTY - Political Party
SCC - Small Contributor Committee

FPPC Form 460 (Jan/2018)
FPPC Advice: advice@fppc.ca.gov (866/275-3772)
www.fppc.ca.gov


PC 3/28/2024
ITEM # 2
2 PAGES

CCUP-21-004/Single Source-Letter from Neighbor

Krista Brox <krista.brox@gmail.com>

Wed 3/27/2024 3:09 PM

To: Planning Department <planning@edcgov.us>

 1 attachments (68 KB)

Letter to Planning Commission.pdf;

Hello,

I would like to submit this letter in Regards to the Planning Commission meeting to be held tomorrow about the proposed Marijuana Grow Facility in my neighborhood.
I will also attend the meeting.

Thank you,
Krista Brox

--

Krista Brox

Personal Transaction Coordinator

krista.brox@gmail.com

Krista Brox
3137 Squirrel Hollow
Somerset, CA 95656

March 27, 2024

Members of the Planning Commission,

Re: CCUP-21-004/Single Source

The subject property at APN 046-710-017 is across the street from our home at APN 046-710-003.

When I look out my kitchen window, I look out at the hillside covered in a vineyard, tree's and the Sierra Mountains in the distance.

We bought our home when my husband retired and chose this private residential community because we value the privacy, peace, quiet and nature that surrounds us.

The thought of having a Marijuana Grow and Processing Facility in our neighborhood is horrible. This shouldn't even be considered in a residential neighborhood! Our home prices will most certainly be affected when we disclosure this information to a buyer. When they compare home why would they choose to live next door to a pot farm?

The Inevitable offensive Odor info as provided in the Report completed and submitted by SCS Engineers dated March 25, 2024 explains this. The use of larger than normal amounts of water to grow the plants which will reduce the ground water that feeds our wells. The added traffic from the employees to run this facility, the pollution to our streams and obnoxious Lights needed to supplement the plants to grow are all Environmental Pollution that needs to be carefully examined and studied.

A lot of us who live in El Dorado County are here because we do not want to live in a crowded city where you can't avoid these pollutants. The Community relays on all of you on this board to protect us. Please do not allowing a commercial business to move into our (again I preface Residential neighborhood).

Sincerely,

Krista Brox